

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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*In re* ORLY GINGER,  
Debtor.

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Chapter 7  
Case No. 19-13895 (JLG)

*In re* Application of ORLY GINGER to Remove Dalia  
Genger as Trustee of the Orly Genger 1993 Trust  
Established on Dec. 13, 1993 by Arie Genger, grantor.

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N.Y. Cty. Surrogate's Court  
File No.: 2008-0017

Orly Genger, beneficiary of The Orly Genger 1993 Trust,

Petitioner,

- against -

Dalia Genger, as trustee of The Orly Genger 1993 Trust,  
and The Sagi Genger 1993 Trust,

Respondents.

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No. 20-ap-01187-jlg

In the Petition of DALIA GINGER, as Trustee of the  
Orly Genger 1993 Trust Established on Dec. 13, 1993 by  
Arie Genger, grantor.

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N.Y. Cty. Surrogate's Court  
File No.: 2008-0017/E

Michael Oldner, trustee of the Orly Genger 1993 Trust,

Petitioner,

v.

Orly Genger, Arie Genger, Glenclova Investment  
Company, TR Investors, LLC, New TR Equity I, LLC,  
New TR Equity II, LLC, Trans-Resources, Inc., Arnold  
Broser, David Broser, John Does 1-20, and Jane Does  
1-20,

Respondents.

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No. 20-ap-01188-jlg

**NOTICE OF APPEARANCE AND  
DEMAND FOR NOTICE AND FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the undersigned hereby appears as Counsel for Creditor The Orly Genger 1993 Trust in the above-referenced chapter 7 and adversary proceedings, and requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given to and served upon the undersigned attorneys, or on its behalf, at the following address:

Adam Pollock  
Pollock Cohen LLP  
60 Broad St., 24th Fl.  
New York, NY 10004  
(212) 337-5361  
Adam@PollockCohen.com

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance and Request of Service of Papers includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleadings, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, fax, or otherwise that (1) affects or seeks to affect in any way any rights or interests of any creditor or party-in-interest in this case, including, with respect to: (a) the debtors; (b) property of the estates, or proceeds thereof, in which the debtors may claim an interest; or (c) property or proceeds thereof in the possession, custody or control of others that the debtors may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment, or other conduct.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive The Orly Genger 1993 Trust's (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; (iv) right to enforce any contractual

provisions with respect to arbitration; or (v) other rights, claims, actions, defenses, setoffs, or recoupments to which The Orly Genger 1993 Trust has or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: July 12, 2020  
New York, NY

POLLOCK COHEN LLP

By: /s/ Adam Pollock

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*Attorneys for The Orly Genger 1993 Trust,  
through Michael Oldner, Trustee*